

EXHIBIT B

Gent, Donna S. (Detroit)

From: Waslawski, Daniel C. (Detroit)
Sent: Monday, March 6, 2023 9:14 AM
To: Eric Stempien
Cc: Shawn Barrows; LeBeau, Michelle J. (Detroit); Gent, Donna S. (Detroit)
Subject: RE: Elzein v. Ascension Genesys -- Status of Plaintiff's Discovery Responses
Attachments: Proposed stipulated compelling discovery (Elzeinv. AGH).docx

Good morning Eric,

I am following up on the voicemail that I just left you, as well as my emails set forth below in this chain. To date, we have not received Plaintiff's FRCP 26(a) initial disclosures, answers to Defendant's first set of interrogatories, or answers to Defendant's first set of requests for production of documents. Please consider this email my attempt to obtain your concurrence in a motion to compel discovery. Should you concur, please advise whether I have your consent to: (a) sign your name to the attached proposed stipulated order and (b) file it with the trial court.

Should I not hear from you by 5:00 PM today, I will assume that concurrence has been denied.

Thanks,

Dan



Daniel C. Waslawski

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From: Waslawski, Daniel C. (Detroit) <Daniel.Waslawski@JacksonLewis.com>

Sent: Monday, February 27, 2023 12:02 PM

To: Eric Stempien <eric@stempien.com>

Cc: Shawn Barrows <shawn@stempien.com>; LeBeau, Michelle J. (Detroit) <Michelle.LeBeau@jacksonlewis.com>; Gent, Donna S. (Detroit) <Donna.Gent@jacksonlewis.com>

Subject: RE: Elzein v. Ascension Genesys -- Status of Plaintiff's Discovery Responses

Good afternoon Eric,

I never heard from you last week. Please advise.

Thanks,

Dan



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From: Waslawski, Daniel C. (Detroit) <Daniel.Waslawski@Jacksonlewis.com>

Sent: Friday, February 17, 2023 9:49 AM

To: Eric Stempien <eric@stempien.com>

Cc: Shawn Barrows <shawn@stempien.com>; LeBeau, Michelle J. (Detroit) <Michelle.LeBeau@jacksonlewis.com>; Gent, Donna S. (Detroit) <Donna.Gent@jacksonlewis.com>

Subject: RE: Elzein v. Ascension Genesys -- Status of Plaintiff's Discovery Responses

Thanks for the response. That is totally fine. Just let me know on Monday if you need additional time.



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From: Eric Stempien <eric@stempien.com>

Sent: Friday, February 17, 2023 9:48 AM

To: Waslawski, Daniel C. (Detroit) <Daniel.Waslawski@Jacksonlewis.com>

Cc: Shawn Barrows <shawn@stempien.com>; LeBeau, Michelle J. (Detroit) <Michelle.LeBeau@jacksonlewis.com>; Gent, Donna S. (Detroit) <Donna.Gent@jacksonlewis.com>

Subject: RE: Elzein v. Ascension Genesys -- Status of Plaintiff's Discovery Responses

Apologies for not responding sooner. I'm in a dep all day today, so if you can give me until Monday to figure out where we are at with the discovery and IDs, that would be great. I think that we are pretty far along, may only be waiting for my review, but I don't specifically recall. Hopefully I'll be able to get these to you on Monday. Thanks

Eric Stempien

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From: Waslawski, Daniel C. (Detroit) <Daniel.Waslawski@Jacksonlewis.com>
Sent: Friday, February 17, 2023 9:08 AM
To: Eric Stempien <eric@stempien.com>
Cc: Shawn Barrows <shawn@stempien.com>; LeBeau, Michelle J. (Detroit) <Michelle.LeBeau@jacksonlewis.com>; Gent, Donna S. (Detroit) <Donna.Gent@jacksonlewis.com>
Subject: RE: Elzein v. Ascension Genesys -- Status of Plaintiff's Discovery Responses

Good morning Eric,

I am following up on my email below. Please advise.

Thanks,

From: Waslawski, Daniel C. (Detroit) <Daniel.Waslawski@Jacksonlewis.com>
Sent: Wednesday, February 15, 2023 9:19 AM
To: Eric Stempien <eric@stempien.com>
Cc: Shawn Barrows <shawn@stempien.com>; LeBeau, Michelle J. (Detroit) <Michelle.LeBeau@jacksonlewis.com>; Gent, Donna S. (Detroit) <Donna.Gent@jacksonlewis.com>
Subject: Elzein v. Ascension Genesys -- Status of Plaintiff's Discovery Responses

Good morning Eric,

I hope all is well. To date, we have not received Plaintiff's FRCP 26(a) initial disclosures, answers to Defendant's first set of interrogatories, or answers to Defendant's first set of requests for production of documents. Please advise as to the status at your earliest convenience. If you need additional time, we are willing to work with you.

Thanks,



Daniel C. Waslawski
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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

AHMED ELZEIN,

Plaintiff,

v.

ASCENSION GENESYS HOSPITAL,

Defendant.

Case No: 2:22-cv-12352

Hon. Sean F. Cox

Magistrate Curtis Ivy, Jr.

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**STIPULATED ORDER COMPELLING PLAINTIFF TO SERVE FED. R.
CIV. P. 26(a) INITIAL DISCLOSURES AND RESPONSES TO
DEFENDANT'S FIRST SET OF DISCOVERY REQUESTS**

This matter having come before the Court upon stipulation of the parties,
and the Court being fully advised on the premises that:

IT IS HEREBY ORDERED that Plaintiff shall serve and provide complete
written answers and responsive document to Defendant's First Set of
Interrogatories and First Request for Production of Documents (including by

producing any and all responsive documents, things, and executed authorizations) on or before March 13, 2023.

IT IS FURTHER ORDERED that Plaintiff shall serve and provide complete Fed. R. Civ. P. 26(a) initial disclosures on or before March 13, 2023.

IT IS SO ORDERED.

DATE

Hon. Sean F. Cox

WE STIPULATE TO THE ENTRY OF THE ABOVE ORDER:

By: /s/ (with consent)
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Eric Stempien (P58703)
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By: /s/ Daniel C. Waslawski
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